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March 24, 2023

**Submitted via ECF**

Honorable Michael A. Hammer, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: Request to Change Scheduling Order**  
***Doe v. Rutgers, et al., Civil Action No. 21-20763 (D. N.J.)***

Dear Judge Hammer,

On behalf of Plaintiff Veronica Doe, and with the consent of counsel for Defendants Rutgers University and Scott Strother, we respectfully request modifications to the Amended Scheduling Order (ECF No. 63).

The parties are working in good faith to complete expert discovery and have agreed to accommodate one of Plaintiff's experts, Dr. Lama Bazzi, by allowing her alone to submit an expert report on April 7, 2023, rather than on March 28, 2023. In exchange, Plaintiff has agreed that Defendants' responding expert to Dr. Bazzi can likewise extend their expert report deadline from April 28, 2023, to May 8, 2023, and that expert deposition deadlines should be extended from Monday, May 29, 2023, to June 8, 2023.

We thank the Court for its consideration of this request. If the Court has any questions for counsel, we are available to respond at the Court's convenience.

Respectfully Submitted,

s/Laura L. Dunn

Laura L. Dunn, Esq. (*pro hac vice*)

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s/Brian D. Kent

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Joint Request to Change Scheduling Order

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cc: Counsel of Record (via ECF)